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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DANIEL D'AMBLY,

Case No. 2:20-cv-12880-JMV-JAD

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANTIFASH
GORDON; ST. LAWRENCE
UNIVERSITY; TRIBUNE PUBLISHING
COMPANY; NEW YORK DAILY NEWS;
VIJAY GADDE; TWITTER, INC.;
COHEN, WEISS AND SIMON LLP,

Defendants.

Civil Action

COHEN, WEISS AND SIMON LLP'S
NOTICE OF MOTION FOR SANCTIONS
PURSUANT TO FED.R.CIV.P. 11(c)

MOTION DATE: January 3, 2022

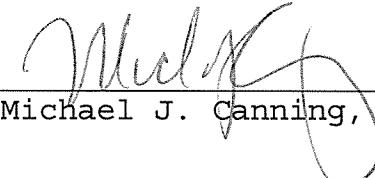
PLEASE TAKE NOTICE that Giordano, Halleran & Ciesla, P.C.,
counsel for Defendant, Cohen, Weiss and Simon LLP ("CWS"), shall
move before the United States District Court for the District of
New Jersey, located at 50 Walnut Street, Newark, New Jersey on
_____, 20____ at 9:00 a.m. or as soon
thereafter as counsel may be heard, for the entry of an order
imposing sanctions against Plaintiff, Daniel D'Ambly and awarding
CWS reasonable attorneys' fees and costs against Plaintiff's
counsel pursuant to Fed.R.Civ.P. 11(c).

PLEASE TAKE FURTHER NOTICE that in support of the motion, CWS shall rely upon the Certification of Michael J. Canning, Esq. and Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if opposition to this motion is filed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

GIORDANO, HALLERAN & CIESLA, P.C.
Attorneys for Defendant, Cohen,
Weiss and Simon LLP

By: 

Michael J. Canning, Esq.

Dated: December 3, 2021

Docs #5426904-v1